

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

IN RE	)	
	)	
ALEXANDER E. JONES	)	CASE No. 22-33553
	)	
DEBTOR.	)	(CHAPTER 11)
	)	
	)	JUDGE CHRISTOPHER M. LOPEZ

**FOURTH MONTHLY FEE STATEMENT OF JORDAN & ORTIZ, P.C. FOR  
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS  
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM  
MARCH 1, 2023 THROUGH MARCH 31, 2023**

<b>Name of Applicant:</b>	Jordan & Ortiz, P.C. (“J&O”)	
<b>Applicant’s Role in Case:</b>	Co-Counsel to Debtor	
<b>Date Order of Appointment Signed:</b>	January 20, 2023 (Dkt #105)	
	<b>Beginning of Period</b>	<b>End of Period</b>
<b>Time Period Covered in Statement:</b>	03/01/2023	03/31/2023
<b>Summary of Total Fees and Expenses Requested</b>		
<b>Total Fees Requested in this Statement:</b>	\$37,456.00 <sup>1</sup> (80% of \$46,820.00)	
<b>Total Reimbursable Expenses Requested in this Statement:</b>	\$120.30 <sup>2</sup>	
<b>Summary Attorney Fees for the Period Covered by this Statement</b>		
<b>Attorneys Fees in this Statement:</b>	\$45,895.00	
<b>Total Actual Attorneys Hours Covered by this Statement:</b>	76.70	
<b>Average Hourly Rate for Attorneys:</b>	\$598.37	
<b>Summary Paraprofessional Fees for the Period Covered by this Statement</b>		
<b>Paraprofessional Fees Requested in this Statement:</b>	\$925.00	
<b>Total Actual Paraprofessional Hours Covered by this Statement:</b>	3.70	
<b>Average Hourly Rate for Paraprofessionals:</b>	\$250.00	

<sup>1</sup> Counsel is holding \$20,804.57 as a retainer in its IOLTA Account which is included in this fee/expense request.

<sup>2</sup> The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

**In accordance with the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.**

### **RELIEF REQUESTED**

1. This is Jordan & Ortiz, P.C.'s ("J&O") fourth monthly fee statement for compensation (the "Fee Statement") for the period of March 1, 2023 through March 31, 2023 (the "Fee Period") pursuant to the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106] (the "Interim Compensation Order"). J&O is filing its first amended monthly fee statement for compensation showing that J&O requests: (a) allowance of compensation in the amount of \$37,456.00 (80% of \$46,820.00) for actual, reasonable, and necessary professional services rendered to the Debtor by J&O and (b) reimbursement of actual, reasonable, and necessary costs and expenses in the amount of \$120.30 incurred by J&O during the Fee Period. By this Fee Statement, J&O seeks interim allowance of compensation for services rendered and reimbursement of expenses incurred solely in connection with its work performed on behalf of the Debtor.

### **SERVICES RENDERED AND DISBURSEMENTS INCURRED**

2. Attached above as Exhibit "A" is the Fee Statement for the period March 1, 2023 through March 31, 2023, which includes a summary of professionals who rendered services to the Debtor during the Fee Period, including each person's billing rate and the fees incurred during the Fee Period summarized by task code and the itemized schedule of expenses within each category,

including description, incurred with the amounts for which reimbursement is requested. Attached as Exhibit “B” is a Task Code breakdown by Attorney and Paralegal.

### NOTICE AND OBJECTION PROCEDURES

3. Pursuant to the Interim Compensation Order notice of this Fee Statement has been provided to:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, [dallaseservice@crowedunlevy.com](mailto:dallaseservice@crowedunlevy.com))
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, [ha.nguyen@usdoj.gov](mailto:ha.nguyen@usdoj.gov), [jayson.b.ruff@usdoj.gov](mailto:jayson.b.ruff@usdoj.gov)
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; [dzensky@akingump.com](mailto:dzensky@akingump.com), [mbrimmage@akingump.com](mailto:mbrimmage@akingump.com), [sbrauner@akingump.com](mailto:sbrauner@akingump.com), [melanie.miller@akingump.com](mailto:melanie.miller@akingump.com))
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, [ASterling@koskoff.com](mailto:ASterling@koskoff.com)) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, [kkimpler@paulweiss.com](mailto:kkimpler@paulweiss.com), [msalvucci@paulweiss.com](mailto:msalvucci@paulweiss.com))
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, [avi.moshenberg@mhllp.com](mailto:avi.moshenberg@mhllp.com)) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, [Jarrod.Martin@chamberlainlaw.com](mailto:Jarrod.Martin@chamberlainlaw.com))
- f. All parties that receive ECF notifications

In light of the nature of the relief requested herein, J&O submits that no further or other notice is required.

4. Pursuant to the Interim Compensation Order (ECF #106), the Notice Parties and parties in interest have 14 days after service of the Monthly Fee Statement to object to the requested fees and expenses. If any Notice Party, or any other party in interest, objects to a Retained

Professional's Monthly Fee Statement, it must serve on the affected Retained Professional and each of the other Notice Parties a written objection (the "Objection") so that it is received on or before the Objection Deadline. Thereafter, the objecting party and the affected Retained Professional may attempt to resolve the Objection on a consensual basis. If the parties are unable to reach a resolution of the Objection within 14 days after service of the Objection, or such later date as may be agreed upon by the objecting party and the affected Retained Professional, the affected Retained Professional may either: (i) file a response to the Objection with the Court, together with a request for payment of the difference, if any, between the Maximum Payment and the Authorized Payment made to the affected Retained Professional (the "Incremental Amount") and schedule such matter for hearing on at least 14 days' notice; or (ii) forego payment of the Incremental Amount until the next interim or final fee application hearing, at which time the Court will consider and dispose of the Objection if requested by the affected Retained Professional. Failure by a Notice Party, or any other party in interest, to object to a Monthly Fee Statement shall not constitute a waiver of any kind nor prejudice that party's right to object to any Interim Fee Application (as defined below) subsequently filed by a Retained Professional.

5. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. J&O reserves the right to make further application to this Court for allowance of such fees and expenses not included herein, or correct and erroneous or errors set out herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

WHEREFORE, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, J&O respectfully requests: (a) that it be allowed on an interim basis (i) \$37,456.00 (80% of fees in the amount of \$46,820.00) for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and (ii) reimbursement of \$120.30 for reasonable, actual and necessary expenses incurred during the Fee Period; (b) that the Debtor be authorized and directed to immediately pay to J&O the amount of \$37,576.30 which is equal to the sum of 80% of J&O's fees and 100% of J&O's expenses incurred during the Fee Period, and (c) and granting such other and further relief as the Court may deem just and proper.

Dated: April 26, 2023

/s/ Shelby A. Jordan  
SHELBY A. JORDAN  
State Bar No. 11016700  
S.D. No. 2195  
ANTONIO ORTIZ  
State Bar No. 24074839  
S.D. No. 1127322  
***Jordan & Ortiz, P.C.***  
500 North Shoreline Blvd., Suite 900  
Corpus Christi, TX 78401  
Telephone: (361) 884-5678  
Facsimile: (361) 888-5555  
Email: [sjordan@jhwclaw.com](mailto:sjordan@jhwclaw.com)  
[aortiz@jhwclaw.com](mailto:aortiz@jhwclaw.com)  
Copy to: [cmadden@jhwclaw.com](mailto:cmadden@jhwclaw.com)  
**CO-COUNSEL FOR DEBTOR**

### CERTIFICATE OF SERVICE

I certify that on April 26, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, [dallaseservice@crowedunlevy.com](mailto:dallaseservice@crowedunlevy.com))
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, [ha.nguyen@usdoj.gov](mailto:ha.nguyen@usdoj.gov), [jayson.b.ruff@usdoj.gov](mailto:jayson.b.ruff@usdoj.gov)
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; [dzensky@akingump.com](mailto:dzensky@akingump.com), [mbrimmage@akingump.com](mailto:mbrimmage@akingump.com), [sbrauner@akingump.com](mailto:sbrauner@akingump.com), [melanie.miller@akingump.com](mailto:melanie.miller@akingump.com))
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, [ASterling@koskoff.com](mailto:ASterling@koskoff.com)) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, [kkimpler@paulweiss.com](mailto:kkimpler@paulweiss.com), [msalvucci@paulweiss.com](mailto:msalvucci@paulweiss.com))
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, [avi.moshenberg@mhllp.com](mailto:avi.moshenberg@mhllp.com)) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, [Jarrod.Martin@chamberlainlaw.com](mailto:Jarrod.Martin@chamberlainlaw.com))
- f. All parties that receive ECF notifications

/s/ Shelby A. Jordan

Shelby A. Jordan

**EXHIBIT “A”****JORDAN & ORTIZ, P.C. MARCH INVOICE FOR PERIOD  
MARCH 1, 2023 THROUGH MARCH 31, 2023****SUMMARY OF PREVIOUS UNPAID INVOICES**

<b><u>Invoice No.</u></b>	<b><u>Month Billed</u></b>	<b><u>Invoice Date</u></b>	<b><u>Amount Billed</u></b>	<b><u>Credits Applied</u></b>	<b><u>Remaining Balance Due</u></b>
922199	December	1/27/23	\$77,869.15	-\$62,396.65	\$15,472.50
922213	January	2/15/23	\$28,227.50	-\$22,602.50	\$5,625.00
922268	February	3/2/23	\$51,227.44	-\$40,986.44	\$10,241.00
<b>TOTALS</b>			<b>\$157,324.09</b>	<b>-\$125,985.59</b>	<b>\$31,338.50</b>

JORDAN & ORTIZ, P.C.  
 500 N. SHORELINE BLVD, SUITE 900  
 CORPUS CHRISTI, TEXAS 78401-0341  
 TAX ID NO. 74-2553880  
 (361) 884-5678

JONES, ALEX  
 alexejones1777@gmail.com

Page: 1  
 April 06, 2023  
 Account No: 5481-002000M  
 Statement No: 922376

Bankruptcy

PREVIOUS BALANCE

\$72,324.94

Hours

03/01/2023	SAJ	B210	A103	Review financial statements of FSS from August 1, 2022 to January 31, 2023 and prepare memo.	0.80
	SAJ	B210	A106	Call to debtor and conference regarding FSS financial statements.	0.20
	SAJ	B210	A107	Email and respond to co-counsel regarding communication with Jones and status of his response.	0.20
	SAJ	B190	A103	Work on memo regarding dischargeability of Texas and Conn Plaintiffs and circulate drafts to debtor and co-counsel.	2.80
03/02/2023	SAJ	B110	A108	Follow up on note for Guadalupe Tax office notice of recording of quitclaim deed and need to change of address to debtor.	0.20
	SAJ	B120	A108	Receive and begin review of email from Richard Reeves sending per my request relevant documents, including emails, January 13 notice of cancellation of membership status and other related documents.	1.00
	SAJ	B120	A108	Call to Reeves for explanation and beginning chronology and how to find missing information.	0.40
	SAJ	B160	A103	Finish modification to Second Monthly Fee Statement to conform February filings.	0.20
	SAJ	B190	A107	Conference with Battaglia regarding Avi Moshenbourg threat to share or make public all documents produced by FSS in underlying state court case and response including response regarding new confidentiality order and publication subject thereto per co-counsel's email notice of intent to be bound and email response to Moshenbourg to notice.	1.00
	SAJ	B190	A106	Email to debtor regarding response to retraction and status of Piers Morgan agreement to air retraction.	0.20



JONES, ALEX

Account No: 5481-002000M  
Statement No: 922376

Bankruptcy

					Hours	
	SAJ	B240	A106	Review with debtor new POC by IRS of \$558,984.64 and email to Bob Schleizer and co-counsel.	0.30	
	AO	B190	A104	Review memo circulated by Shelby Jordan regarding dischargeability and conference regarding same.	1.00	
03/03/2023	SAJ	B120	A103	Receive data dump from Reeves and begin drafting demand to Youngevity recovery of royalty payments and response to suspension letter and conference with Richard Reeves regarding documents and emails and chronology.	2.20	
	SAJ	B170	A104	Review/analyze for confidentiality the Appellee UST designations on appeal by Schwartz and Lee and compare to S&L Appellate designations.	0.30	
03/04/2023	SAJ	B120	A103	Work on documents for Youngevity claims review and prepare chronology.	1.10	
03/05/2023	SAJ	B120	A103	Work on documents for Youngevity claims including emails and email to Richard Reeves and conference with debtor.	1.40	
03/06/2023	CRM	B160	A103	Prepare draft of third monthly fee statement.	0.70	
	SAJ	B110	A106	Call from debtor regarding current operations and FSS financial statements (6 months P&L).	0.70	
	SAJ	B120	A104	Continue to review documents and email correspondence.	1.30	
	SAJ	B120	A107	Call to co-counsel and leave message.	0.10	n/c
	SAJ	B190	A107	Calls on De La Rosa lift stay.	0.20	n/c
	SAJ	B190	A104	Review exhibit lists of hearing on motion to compel for exhibits and expected witnesses.	0.40	
	SAJ	B190	A103	Work on details of research on discharge issue to add back to memo sent to co-counsel.	0.60	
	SAJ	B140	A107	Call to Martin, Reynal, co-counsel regarding unable to attend telephone conference set today and issues of additional trials.	0.30	
	SAJ	B140	A106	Call from debtor about lift stay and attendance on call.	0.30	
03/07/2023	SAJ	B110	A104	Receive and review UST's response to motion to revoke sub V status of FSS.	0.40	
	SAJ	B120	A108	Meeting and telephone call with Richard Reeves and review batched emails on issue of Youngevity and review background facts and financial status of Youngevity and research quarterly financial report.	2.70	
	SAJ	B120	A106	Meeting with debtor and co-counsel at debtors office and		

## Bankruptcy

					Hours
			meeting with David Jones on history, chronology and approach to recovery of distributions due debtor from Youngevity.		1.00
	SAJ	B140	A107	Conference with co-counsel and Reynal regarding stay relief and intention to set trial date and issues of additional trial with Chris Martin.	0.30
	SAJ	B140	A106	Conference with debtor regarding conference with co-counsel and Reynal.	0.20
03/08/2023	SAJ	B210	A109	Prepare and attend hearing on motion to compel amendment to schedules.	0.80
	SAJ	B120	A103	Work on demand letter to Youngevity and look for any signed document and amendments.	1.20
	SAJ	B120	A106	Meeting with debtor regarding Youngevity.	0.40
	SAJ	B320	A104	Begin review of FSS Plan filed today and conference with Battaglia regarding Plan and issues of Sub V case designation and objections.	1.00
	SAJ	B320	A104	Review and send current published brief on issues of corporate discharge under 523.	0.70
03/09/2023	SAJ	B210	A106	Send debtor copy of FSS plan as requested and brief summary of questions of Sub Ch V.	0.50
	SAJ	B410	A106	Conference with Debtor regarding implications of January 6 evidence and issues regarding debtor.	0.60
	SAJ	B410	A107	Conference with Norm Pattis regarding January 6 evidence and status of debtor's risk of involvement.	0.30
	SAJ	B120	A107	Telephone conference with co-counsel regarding status of Youngevity (both financial and allegations of breach) and work on response and demand for payment.	0.70
	SAJ	B140	A107	Conference with co-counsel on status of stay relief and potential for another trial pre-mediation.	0.30
03/10/2023	SAJ	B160	A107	Email explanation to Reynal on fee applications and monthly hold back along with copy of Court's order.	0.30
	SAJ	B160	A103	Finish for circulation 3rd monthly fee statement.	0.30
	SAJ	B185	A103	Review draft of pleading and work on rejection of executory contract motion regarding elevated solutions two contracts.	0.30
	SAJ	B185	A106	Call to debtor and call and message to ESG.	0.20
	SAJ	B185	A107	Email to Bob.	0.10

JONES, ALEX

April 06, 2023

Account No: 5481-002000M  
Statement No: 922376

Bankruptcy

					Hours
	SAJ	B185	A104	Research contract granting right to represent celebrity and granting interest in the whisky celebrity contract and rejection.	0.40
	SAJ	B190	A107	Emails from and to Reynal regarding agreement with Ponzer defendants on lift stay and status of UCC and Sub V to verify.	2.00
	SAJ	B190	A107	Call to Battaglia regarding response to plaintiffs to revoke the Sub V election and review motion and response and discuss with debtor.	0.60
03/13/2023	CRM	B160	A103	Final review of third monthly fee statement and file and serve same.	0.50
	SAJ	B210	A106	Conference with debtor regarding status of notice to court of preliminary issues of conduct of Plaintiffs, status of mediation and upcoming hearings.	0.40
	SAJ	B160	A103	Work on application and Exhibit B of Norm Pattis and emails to co-counsel staff and work on fee agreement signed copies with Alex Jones and FSS.	2.30
	SAJ	B190	A104	Begin review and analysis of Texas and Connecticut Adversary to determine dischargeability of sandy hook plaintiffs claims.	2.10
03/14/2023	SAJ	B160	A107	Call to Pattis regarding edits and location of signed fee agreement with debtor Jones and terms of engagement.	0.40
	SAJ	B160	A107	Review Tenco Capital LLC comment and forward to co-counsel.	0.20
	SAJ	B190	A104	Continue to review and analysis of Texas and Connecticut Adversary to determine dischargeability of Sandy Hook Plaintiffs claims.	1.20
03/16/2023	CRM	B190	A103	Prepare notices of appearances in all new adversary matters and file same.	0.50
	SAJ	B185	A103	Review and begin edits to motion to reject ESG executory contracts, conference with debtor, call to Joey D and email to Bob.	1.00
	SAJ	B190	A104	Continue to review and comment on objection to dischargeability and conference with debtor regarding same.	1.30
03/17/2023	SAJ	B110	A106	Conference with client regarding McGill questions and issues and decision to reject executory contracts and issues raised by Plaintiff in removal of the Sub-V.	0.40
	SAJ	B185	A107	Emails from and to Bob S/Harold regarding rejection of executory contracts of ESG.	0.20

JONES, ALEX

April 06, 2023

Account No: 5481-002000M  
Statement No: 922376

Bankruptcy

					Hours
	SAJ	B185	A106	Email to client and email from co-counsel and telephone conference with ESG and debtor regarding rejection of executory contracts of ESG..	0.20
	SAJ	B190	A103	Work on pleading summary and analysis regarding dischargeability.	1.00
	SAJ	B190	A104	Receipt and review and compare new 2004 exam to FSS and Alex Jones served by Freeman filed under seal and circulate.	0.30
	SAJ	B190	A104	Receipt and review notice of 2004 exam to ESG and forward and comment.	0.20
	SAJ	B190	A106	Conference with client regarding explanation of suits filed by Tex and NY and defenses and potential new trial.	0.60
03/18/2023	SAJ	B190	A103	Work on TX Plaintiffs objection to dischargeability pleading summary and discharge defense research issues.	2.10
03/19/2023	SAJ	B110	A106	Call from debtor regarding scheduling meeting with co-counsel and prepare list of issues and topics for conference.	0.40
03/20/2023	SAJ	B110	A107	Email to co-counsel with list of Jones questions and scheduling meeting on issues.	0.20
	SAJ	B210	A105	Conference with client regarding current strategy list of pending matters including EGS rejection of contracts and operations, nature of objections to discharge and how procedures work and appellate status.	0.60
03/21/2023	CRM	B120	A107	Email from co-counsel regarding current deed for Cedar Creek and pull land records to run search for same to locate and email to co-counsel.	0.60
	SAJ	B190	A107	Review co-counsel email regarding production of documents to UCC and basis of redaction or motion AEO.	0.20
	SAJ	B190	A103	Work on notes and outline to both TX and Conn Plaintiffs objection to dischargeability.	1.10
03/22/2023	SAJ	B190	A106	Call from Debtor regarding strategy issues list add Youngevity.	0.30
	SAJ	B190	A107	Call from Norm Pattis regarding debtor issues in Jan 6th subpoena possibility.	0.20
03/24/2023	SAJ	B210	A106	Call from debtor and create list of issues and topics debtor wants to have an "all hand" conference on and email to co-counsel regarding next Tuesday meeting.	1.00
	SAJ	B120	A103	Work on Youngevity demand letter to forward to debtor or names and email Harmon for CEO email or correct mailing address.	1.30

JONES, ALEX

April 06, 2023

Account No: 5481-002000M  
Statement No: 922376

Bankruptcy

					Hours
03/25/2023	CRM	B120	A108	Various emails with BlackBriar regarding wires and search and send all information for same to Shelby Jordan, co-counsel and BlackBriar.	0.50
03/26/2023	SAJ	B210	A106	Conference with debtor and co-counsel and work on Youngevity demand letter.	1.00
03/27/2023	SAJ	B210	A109	Prepare and attend hearings on cash collateral, sub chapter V revocation, status of discovery and issues regarding operations and Alex relationship with Mountain Way.	3.20
	SAJ	B210	A106	Four telephone calls with debtor.	0.70
	SAJ	B210	A107	Emails to co-counsel and debtor regarding mountain way and actual facts and prepare memo to co-counsel and conference with Ray Battaglia for September and October invoices.	1.10
	SAJ	B160	A107	Get fee agreements from Norm Pattis for execution by Jones.	0.30
03/28/2023	SAJ	B110	A104	review past notes and emails to determine if any dealt with Mount Way or McGill and MW.	0.50
	SAJ	B110	A104	Review Mountain Way invoices paid by FSS showing "Alex Jones Show... promoting Satellite Phone and related products" marked paid and review 11 other similar invoices all marked paid.	1.00
	SAJ	B110	A107	Conference with Battaglia and with co-counsel regarding Mountain Way.	0.40
	SAJ	B110	A104	Review draft of SOFA and Schedules.	0.70
	SAJ	B210	A107	Conference with co-counsel and debtor regarding mountain way and notice given on multiple occasions to McGill.	0.70
	SAJ	B120	A103	Prepare notice demand letter to Youngevity for payment of royalties due regarding suspended contract payments and add internet research sites and circulate to debtor and co-counsel.	2.50
	SAJ	B120	A107	Emails from RJ Shannon and co-counsel and emails to both regarding IP transfers.	0.40
	SAJ	B190	A103	Work on full summaries for response to motion regarding dischargeability and forward brief summary to co-counsel and set up conference call regarding dischargeability.	2.10
	SAJ	B190	A107	Review email from Chris Davis regarding team meeting before conference with Plaintiffs counsel on Friday.	0.30
03/29/2023	SAJ	B120	A107	Discussion with co-counsel regarding value of the 2022 litigation settlement trust and issues with assets, status,	

JONES, ALEX

April 06, 2023

Account No: 5481-002000M  
Statement No: 922376

Bankruptcy

			ownership and status.	Hours 0.70		
	SAJ	B110	A107	Work on issues of Mountain Way and emails regarding Jess Schulze notice of Mountain Way and emails to co-counsel.	0.50	
	SAJ	B110	A107	Continue to review issues with Schedules and SOFA and comments from Porter UCC counsel and emails to co-counsel.	0.80	
	SAJ	B190	A104	Review POC docket and determine issues of objections to Plaintiffs claims and memo along with memo on claims estimate where no res judicate applies.	1.90	
03/30/2023	CRM	B150	A109	Attend continued 341 meeting and take notes for Shelby Jordan.	0.90	
	SAJ	B120	A103	Forward updated final draft of Youngevity demand letter to co-counsel after conference with Reese and debtor.	0.80	
03/31/2023	SAJ	B110	A107	Review email from Bob Schleizer regarding amended schedules and issue raised by Porter (comment) and co-counsel letter regarding value of trust.	0.40	
	SAJ	B110	A104	Review amended schedule A/B for completeness.	0.30	
	SAJ	B110	A104	Review Porter issues of non-cooperation with debtor counsel and comment.	0.30	
	SAJ	B160	A108	Email to Roger Borgelt regarding 2022 litigation trust representation and email to Rob Dew and Richard Dale to assure SOS and certificates of authority are being maintained and counsel is assisting Dew.	0.60	
	SAJ	B190	A107	Conference call with dischargeability team to review Monday and Tuesday matters and work on organization of research for team call.	3.10	
	SAJ	B190	A107	Attend conference call with Plaintiffs counsel regarding proposed scheduling order.	1.00	
			For Current Services Rendered	80.40	46,820.00	
			Total Non-billable Hours	0.30		

## Recapitulation

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
SHELBY A. JORDAN	Partners	75.70	\$600.00	\$45,420.00
ANTONIO ORTIZ	Partners	1.00	475.00	475.00
CHRYSTAL MADDEN	Paralegals	3.70	250.00	925.00

03/31/2023	B110	E106	Pacer	120.30
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JONES, ALEX

April 06, 2023

Account No: 5481-002000M  
Statement No: 922376

Bankruptcy

Total Expenses	120.30
Total Current Work	46,940.30
Total Payments	-40,986.44
Balance Due	<u>\$78,278.80</u>

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	4320.00	120.30
B120	Asset Analysis and Recovery	11735.00	0.00
B140	Relief from Stay/Adequate Protection Proceedings	840.00	0.00
B150	Meetings of and Communications with Creditors	225.00	0.00
B160	Fee/Employment Applications	3060.00	0.00
B170	Fee/Employment Objections	180.00	0.00
B185	Assumption/Rejection of Leases and Contracts	1440.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	16560.00	0.00
B100	Administration	<u>38,360.00</u>	<u>120.30</u>
B210	Business Operations	6720.00	0.00
B240	Tax Issues	180.00	0.00
B200	Operations	<u>6,900.00</u>	<u>0.00</u>
B320	Plan and Discosure Statement (including Business Plan)	1020.00	0.00
B300	Claims and Plan	<u>1,020.00</u>	<u>0.00</u>
B410	General Bankruptcy Advice/Opinions	540.00	0.00
B400	Bankruptcy-Related Advice	<u>540.00</u>	<u>0.00</u>

Your trust account #1 balance is

	Opening Balance	\$84,393.51
03/10/2023	Payment of January Fees (80% of fees and 100% of expenses)	-22,602.50
04/04/2023	Payment of February Fees (80% of fees and 100% of expenses)	<u>-40,986.44</u>
	Closing Balance	<u>\$20,804.57</u>

\*The entry N/C signifies time spent for which there will be no charge.\*



**EXHIBIT “B”****TASK CODES**

<b><u>CATEGORIES</u></b>	<b><u>ATTORNEY TIME</u></b>	<b><u>PARALEGAL TIME</u></b>
B110 Case Administration	7.2	
B120 Asset Analysis and Recovery	19.2	1.1
B130 Asset Disposition		
B140 Relief from Stay/Adequate Protection	1.4	
B150 Meetings of & Communications with Creditors		.90
B160 Fee/Employment Applications	4.6	1.2
B170 Fee/Employment Objections	.30	
B180 Avoidance Action Analysis		
B185 Assumption/Rejection of Executory Contracts	2.4	
B190 Other Contested Matters	27.8	.50
B195 Non-Working Travel		
B210 Business Operations	11.2	
B220 Employee Benefits/Pensions		
B230 Financing/Cash Collections		
B240 Tax Issues	.30	
B250 Real Estate		
B260 Board of Directors Matters		
B310 Claims Administration and Objections		
B320 Plan and Disclosure Statement	1.7	
B410 General Bankruptcy Advice/Opinions	.9	
B420 Restructurings		
<b>TOTALS:</b>	<b>76.7</b>	<b>3.7</b>